

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicants thank the Examiner for carefully considering this application and indicating that the drawings filed on March 17, 2004, are accepted.

Disposition of Claims

Claims 1-58 are pending in this application. Claims 1, 11, and 21 are independent. The remaining claims depend, either directly or indirectly, from claims 1, 11, and 21.

Claim Amendments

Claims 1, 11, and 21 are amended to clarify aspects of the invention. No new matter is added by these amendments as support for the amendments may be found, for example, in paragraph [00191] of the Instant Specification. Further, claim 9 is hereby amended to address informalities as requested by the Examiner.

Claim Objections

As requested by the Examiner, claim 9 is amended to address informalities. Applicants assert no new subject matter has been introduced by way of this amendment. In view of this, the Examiner's objection with respect to claim 9 is now moot and should be withdrawn.

Rejections under 35 U.S.C. § 103

Claims 1-58 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Primavera Project Planner as evidenced by at least *Primavera Project Planner: Planning and Control Guide Version 3.0* (1999) ("Primavera") in view of Sriramdas, *Systems Analysis of*

Drilling Engineering and Management to Design a Relational Database (1998) ("Sriramdas"). To the extent that this rejection may still apply to the amended and original claims, the rejection is respectfully traversed.

MPEP § 2143 states that "[t]he key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit." Further, when combining prior art elements, the Examiner "must articulate the following: (1) a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference; ..." MPEP § 2143(A).

Amended independent claim 1 is directed to a method of well planning. More specifically, amended independent claim 1 recites, in part, that "said task dependency describes input data attributes and results attributes required for each of said one or more tasks." *See* Instant Specification, paragraph [00191]. In other words, amended independent claim 1 requires, in part, that the order of tasks be verified based on whether the necessary inputs for each task are available. *See id.* In contrast, Primavera only teaches that activities may be added with a finish to start relationship. *See* Primavera, page 64. Moreover, an activity of Primavera may be configured by the user to start when another activity starts or ends. *See* Primavera, page 64. However, Primavera fails to disclose that the user may define an activity dependency that describes the inputs and outputs necessary for each of the configured activities. In view of this, Primavera does not teach or suggest verifying the order of tasks based on the necessary inputs for each task as explicitly recited in amended independent claim 1.

Moreover, Sriramdas fails to supply that which Primavera lacks, as evidenced by the fact that the Examiner has relied on Sriramdas solely to teach limitations directed to well planning. See Office Action dated May 22, 2008, pages 4-5. Thus, independent claim 1 is patentable over Primavera and Sriramdas, whether viewed separately or in combination, for at least the reasons given above.

In view of the above, Primavera and Sriramdas, whether considered separately or in combination, do not teach or suggest all the limitations of claim 1. Thus, claim 1 is patentable over Primavera and Sriramdas. In addition, amended independent claims 11 and 21 include at least the same patentable subject matter as claim 1 and, thus, are patentable over Primavera and Sriramdas for at least the same reasons as claim 1. Further, dependent claims 2-10, 12-20, and 22-58 include at least the same patentable subject matter as their independent claims and, thus, are patentable over Primavera and Sriramdas for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09469/029002; 94.0080).

Dated: September 22, 2008

Respectfully submitted,

By /Robert P. Lord/
Robert P. Lord
Registration No.: 46,479
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant

411771_1